DOCKET NO.: IVIA-0004
Application No.: 10/663,325
Office Action Dated: June 6, 2007

PATENT
REPLY FILED UNDER EXPEDITED
PROCEDURE PURSUANT TO
37 CFR § 1.116

REMARKS

Claims 11-18 and 32-47 are pending. Claims 11, 32, and 40 are the independent claims. Claims 11-18 are amended herewith, claims 21-31 are canceled without prejudice, and claims 32-47 are new.

In an Official Action dated Jan. 25, 2007, pending claims 11-18 were rejected under 35 USC §103. While Applicants do not concede the propriety of the claim rejections, Applicants hereby amend claims 11-18 to further clarify Applicants' techniques and to expedite examination of the present application.

More particularly, claim 11 is amended to recite "*computing a navigation probability data field for a cacheline in which said content element is to be stored, where said computing accounts for whether said cacheline has zero, one, or multiple predecessors*". This aspect of the invention is illustrated on pages 36-38 of Applicant's specification and corresponding drawings.

Having reviewed the cited art and the comments provided in the Official Action, Applicants submit that the claims are patentable over the cited references for at least the following reasons. Applicants note that while U.S. Pat. 5,822,759 (Treynor) arguably discloses storing a hit count as stated in the Official Action item 7, such hit count would not account for whether a cacheline has zero, one, or multiple predecessors, as clarified by amended claim 11 and new claims 32 and 40.

Treynor prioritizes items to be cached by assigning them a score. High-score items have high priority to remain in Treynor's cache, while low-score items have low priority. The

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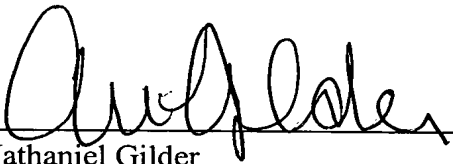Application No.: 10/663,325
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score is increased by hit count or frequency of access, and decreased by item size. See, e.g., Treynor summary, col. 2, lines 15-41.

In contrast, Applicants' claim a more sophisticated approach to caching, which includes, among other aspects, "*computing a navigation probability data field for a cacheline in which said content element is to be stored, where said computing accounts for whether said cacheline has zero, one, or multiple predecessors.*" Treynor does not utilize number of predecessors to determine navigational probability. While Treynor discloses "forming an index of previously accessed items of data" (See col. 2, line 56), Treynor does not indicate whether such previously accessed items are inter-related such that one is a predecessor of another, and moreover does not account for the number of such predecessors in determining navigational probability.

Applicants have reviewed the other references of record and find them similarly deficient in this regard. Accordingly, withdrawal of the outstanding rejections and allowance of claims 11, 32 and 40, and their respective dependent claims 12-18, 33-39 and 41-47 at Examiner's earliest convenience is respectfully requested.

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